

8400248

**From:** "Dale DuVall" <duvalld@qwest.net>  
**To:** <wvogl@samhsa.gov>  
**Date:** 7/10/04 6:31PM  
**Subject:** Comment on New Rules for Drug Testing in the Workplace

To the staff at HHS/SAMHSA,

RE:Revised Mandatory Guidelines FR DOCKET 04-7984

I am concerned about the the new rules concerning drug testing in the workplace in that it would be equating the inability to pee with a refusal to pee. I am a Paruretic and I can tell you that even if you threatened me with death, I could not pee in front of anyone. I do not use drugs and would be glad to prove it any other way. Alternative tests have been shown to be as reliable as urine testing.

I am requesting MANDATORY use of oral fluid, hair, or sweat tests for anyone who requests them, but especially for those asserting that they suffer from Paruresis. Denying alternatives is discriminatory toward Paruretics.

These new rules are flawed because while you are allowing for alternative testing (hair, saliva, patch), you are requiring these tests IN ADDITION to urine tests!

We are law abiding citizens and wish to prove it without being forced into an untenable situation.

Thank you for your time.

Sincerely,

Dale A DuVall  
Eugene, Oregon

**CC:** "Steven Soifer" <ssoifer@ssw.umaryland.edu>